



A Eligibility	B 2012/Previous Programs	C 2014 Program	D Discussion Date	E 2015/Long Term Program	F Priority for Work Group Discussion
2 Eligibility					
3 Recipient Eligibility	Phase I and II Permittees	Cities and Counties only	Determined by language in 2013 Proviso	Expanded to include local governments	High Priority
4 Project Specific Planning and Design Funding	Design/Construct	Design Only or Design/Construct	Determined by language in 2013 Proviso	TBD	High Priority
5 Eligible Funding Limits	\$1M/ project funding limit- \$5M/Jurisdiction	No Change	November 2013	TBD	Low Priority
6 Previously Funded Projects	Ineligible	No Change	November 2013	Ineligible	Low Priority
7 Projects without water quality benefit (ex: fish passage)	Ineligible	No Change	November 2013	TBD - Expanded program may include projects that do not have a direct benefit to water quality.	High Priority
8 Construction of BMPs for new or re-development	Ineligible	Grant can pay for the portion of a BMP that treats existing stormwater.	November 2013	Grant can pay for the portion of a BMP that treats existing stormwater.	Low Priority
9 Runoff from commercial/industrial/private property	Ineligible	Eligible if the local community takes on maintenance/ownership of the BMP by acquiring land or easement.	November 2013	Eligible if the local community takes on maintenance/ownership of the BMP by acquiring land or easement.	Low Priority
10 Flood control projects	Ineligible	Ineligible	November 2013	Ineligible	Low Priority
11 Stream restoration projects	Ineligible	Ineligible	November 2013	Ineligible	Low Priority
12 Land Acquisition	Eligibility limited to the footprint of the facility	Eligibility expanded to include acquisition of land to relocate and existing facility	November 2013	TBD	Low Priority
13 Non-stormwater related portions of projects	Ineligible	Ineligible	November 2013	TBD	Low Priority
14 BMPs that have not received TAPE GULD rating	Ineligible	Ineligible	November 2013	TBD	Medium Priority



	2012/Previous Programs	2014 Program	Discussion Date	2015/Long Term Program	Priority for Work Group Discussion	
15	"War Chest" multiple years of applications for the same project	Ineligible	Ineligible (Projects may have multiple complete phases)	December Meeting Notes	Ineligible (Projects may have multiple complete phases)	Low Priority
16	Activity Projects	Ineligible	Some will be eligible	December Meeting Notes, March Meeting Notes	Eligible	High Priority
17	<b>Application Rating and Ranking Process</b>					
18	Submittal format	Applications are submitted in paper format	Applications are submitted electronically using Ecology's new EAGL program	N/A	Consistent with 2014 Program	Low Priority
19	Program Integration	Stormwater projects were awarded funds through a separate application process - applicants were required to fill out a separate application	Stormwater project funding applications will be submitted with the Ecology Integrated Grant Program and projects will be considered for funding from multiple sources.	Determined by Language in 2013 Proviso	Stormwater project funding applications will be submitted with the Ecology Integrated Grant Program and projects will be considered for funding from multiple sources.	Determined by Language in 2013 Proviso
20	Application Scoring	Projects rated and ranked based on the answers to 7 questions pertaining to: scope of work, Severity of the water quality problem, project team, technical planning process, local commitment, and readiness to proceed.	Application questions have been re-organized and additional guidance will be provided to applicants and reviewers. Changes include: Increasing possible points awarded for a well -thought out scope of work and accurate/cost effective budget, coordination with federal and state priorities. A decreased number of possible points are available questions related to the applicant's definition of the water quality problem and readiness to proceed. Additional points were also added for projects that serve a disadvantaged community.	February 2014 and March 2014	TBD	High Priority

**2012/Previous Programs**

**2014 Program**

**Discussion Date**

**2015/Long Term Program**

**Priority for Work Group Discussion**

21 Program- Specific Definitions

22	Low Impact Development (LID)	Limited to five types: green roofs, bioinfiltration, water capture and re-use, pervious concrete, and soil restoration.	Consistent with the definition listed in NPDES Permits and re-visit for the long term program.	November 2013	TBD	High Priority
23	Local Government	N/A- Permittees only	N/A	TBD	TBD	High Priority
24	Stormwater Activity	N/A	Program will be expanded to include stormwater-related activities that provide water quality benefits such as education and outreach and enhanced maintenance.	March 2013	Program may be expanded to include LID, research and development, pass-through funding for permit implementation, education and outreach, watershed basin retrofit strategy, purchase of pooled equipment, planning and design of stormwater stormwater facilities or other projects TBD.	High Priority
25	Existing Development	N/A	Projects that do not meet the standards for new or re-development as defined by the approved stormwater management manual for the region. For the purposes of this funding program, replacement of impervious surface with pervious surface will not be included in the area of disturbance.	March 2014, TBD April 2014	Consistent with 2014 Definition	Low Priority
26	Stormwater Projects (Facilities)	Capital Building Projects	No change	March 2014	Consistent with 2014 Definition	Low Priority
27	Enhanced Maintenance	N/A	Maintenance activities that exceed requirements of the NPDES permit.	March 2014	TBD	Low Priority
28	Comprehensive Stormwater Planning	N/A	Land use and project prioritization planning.	N/A	TBD	Low Priority
29	Project-Specific Planning	Design and Permitting activities for a specific construction project.	No Change	N/A	TBD	Low Priority
30	Green Infrastructure	Projects as defined by EPA Green Project Reserve	No Change	N/A	TBD	N/A
31	Local Governments	N/A	N/A	TBD	TBD	High Priority

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Past and Future Stormwater Programs	Comment
<b>2012/Previous Programs</b>	
<b>Eligibility</b>	
Low Impact Development (LID)	<p><b>In western Washington "water capture and re-use" is likely not very effective at improving hydrology or water quality of receiving waters and is the most expensive BMP, depending on the application. It should be eligible only when the original water source and the potential infiltration area are within the same drainage sub-basin (not watershed scale). The target is preserving natural hydrology.</b></p> <p>Thurston County <b>Revise Biofiltration to bioretention, revise pervious concrete to permeable pavement.</b> Pierce</p>
<b>Program Specific Definitions</b>	
Eligible Funding Limits	<p><b>\$5 million max per jurisdiction, \$2 million per project</b> City of Redmond <b>Cap should be \$3 M per jurisdiction; \$5 M per jurisdiction is too high.</b> Thurston County</p>
<b>2014 Program</b>	
<b>Application Rating and Ranking Process</b>	
Enhanced Maintenance	<p><b>Support this notion of paying for "enhanced maintenance" and other activities that best address problems from existing development that are above and beyond the permits. The real issue here is best addressing problems from existing development – sometimes the best tool will be structural retrofits; other times it'll be system cleaning (ala Tacoma), additional focused maintenance in certain basins, street sweeping (ala Kitsap), pollution tracking, etc. We should hit the areas we most want to restore, and protect, with this money, knowing it's a great complement to the permits.</b></p> <p>Puget Sound Partnership</p>
Recipient Eligibility	<p><b>First line, when it says 2014 Program "Cities and Counties only" does that mean ALL cities and counties... permittees and non-permittees? This should be made clear.</b></p> <p>Puget Sound Partnership</p>
<b>Eligibility</b>	
Application Scoring	<p><b>well-thought out scope of work is subjective, but OK if the guidance is clear. The criteria "accurate/cost effect budget" is concerning at this stage of project scoping. Accurate is best determined post project. Cost effective, is very subjective and likely varies by the scope of the project. Not all applications reviewed may have the project specific background to determine cost-effective budget.</b></p> <p>Thurston County</p>
BMPs that have not received TAPE GULD rating	<p><b>Support.</b> Pierce</p>
Enhanced Maintenance	<p><b>Support inclusion of enhanced maintenance activities that exceed requirements of the NPDES permit.</b> City of Seattle</p>
Flood control projects	<p><b>I think flood control should be part of the ranking even if water quality is the emphasis. We are still spending our dollars (25%) and it all plays better with management, maintenance, and elected officials if we are fixing a flooding issue in exchange for the new perpetual maintenance that is part of most stormwater BMP's.</b></p> <p>Spokane County <b>Oppose. These projects can have both water quality and ecological benefits.</b> Pierce</p>

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Land Acquisition	<p><b>Also, in addition to relocating an existing facility, should we consider adding in that we'd fund purchase of land for a new facility to "receive" stormwater mitigation (as well as an existing facility). This idea of off-site SW mitigation is currently</b></p> <p>Puget Sound Partnership</p> <p><b>I think it is very important to include land acquisition as eligible. We can do a much better job of preserving natural drainages if we acquire them ahead of development and urbanization. If we focus on preserving drainages just outside of the urban growth area we can preserve a much broader corridor in a more natural state for a fraction of the cost. These broader corridors treats the stormwater better, allow for infiltration, provide habitat corridors, and are an amenity to future development. The alternative is to wait until a development occurs and fight with a developer on the cost and impact to their project and wind up with a pipe. If the group is interested we could talk about this more at the next meeting.</b></p> <p>Spokane County</p> <p><b>Please make acquisition eligible for grant funding so that we don't have to focus only projects that don't include acquisition, which may not be the most cost effective projects.</b></p> <p>King County</p>
Non-stormwater related portions of projects	
Program Integration	<p><b>Support.</b></p> <p>Pierce</p> <p><b>Grant notice language needs to be VERY CLEAR, about the potential for multiple source consideration</b></p> <p>Thurston County</p> <p><b>Should we provide a link so we can see from what multiple sources?</b></p> <p>Pierce</p>
Stream restoration projects	<p><b>Oppose. For same reasons cited above. These projects can have both water quality and ecological benefits.</b></p> <p>Pierce</p>
War Chest multiple years of applications for the same project	<p><b>Please clarify this seems to imply that Phase 3 of Spanaway Lake Park would not be eligible.</b></p> <p>Pierce</p>
<b>Program Specific Definitions</b>	
Construction of BMPs for new or re-development	<p><b>Under Construction of BMPs for new and redevelopment, is our intent that we're not going to fund projects and portions of projects that treat runoff from redevelopment that are required under the permit? And only runoff from standalone retrofit projects? Language should be clearer.</b></p> <p>Puget Sound Partnership</p>
Eligible Funding Limits	<p><b>City would like this changed for this year. \$5 per jurisdiction, but no project limit. Willing to negotiate for something less.</b></p> <p>City of Spokane</p> <p><b>Project funding limit should be increased to \$5M. Jurisdictions should not be penalized for building fewer large regional facilities versus multiple smaller facilities. Especially when, in many cases, large regional facilities can be more cost effective.</b></p> <p>City of Seattle</p>
Projects without water quality benefit (ex: fish passage)	<p><b>Already appear to be eligible. 2013 proviso includes education/outreach projects -- these do not have a direct benefit to water quality.</b></p> <p>Clark County</p>
Project-Specific Planning and Design Funding	<p><b>Modify. The statute includes project planning as an eligible activity in addition to design and construction.</b></p> <p>Pierce</p> <p><b>The proviso also appears to include project-specific planning</b></p> <p>Clark County</p>

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Recipient Eligibility

**Does this exclude Ports? Or is this all phase 1s and all cities and counties?**

Pierce

Runoff from commercial/industrial/ private property

**Under Runoff from Commercial, etc., is the intent that we'd fund standalone retrofit projects from these areas under certain circumstances (and not runoff from redevelopment projects)? If so, that should be made clear.**

Puget Sound Partnership

**2015/ Long Term Program**

**Application Rating and Ranking Process**

Comprehensive Stormwater Planning

**Good to see this a consideration.**

City of Longview

Enhanced Maintenance

**I don't think this grant should pay for regular maintenance.**

City of Spokane

**Eligibility**

Application Scoring

**should be revisit on a regular basis as we learn more what is the highest value and as new permits are issued.**

City of Spokane

BMPs that have not received TAPE GULD rating

**In general non GULD BMPs should be ineligible; however, there should be guidance on when an exception might be allowed such as for Conditional GULD BMPs or where no other suitable type of BMP can be implemented and the BMP does not have GULD approval. Suggest expanded guidance on what would be the circumstances to allow the project to be eligible?**

Thurston County

**remain ineligible**

Clark County

**should include PULD and CULD**

City of Spokane

**The last line in the 4-29 Stormwater Funding Comparison chart indicates "BMPs that have not received TAPE GULD rating" are ineligible for the 2014 program. Thus, only BMPS with a TAPE GULD designation are eligible. However, most "traditional" BMPs (e.g., detention ponds and biofiltration swales) in the Ecology Stormwater Manual have not received evaluation by the TAPE protocol and thus don't have, strictly speaking, a GULD rating. Further, the 2014 program is directed at capital projects addressing impacts from existing infrastructure, which will involve using BMPs that, while they are qualitatively in the Stormwater Manual, may not be designed according to all the applicable standards. It has long been established with the Ecology stormwater group that BMPs used in retrofit projects can be, for example, undersized relative to the design standards that would be applicable to a new development or redevelopment project, regardless of whether those standards are promulgated through the TAPE process or historically established through the Stormwater Manual.**

**Perhaps the committee was intending to confer ineligibility on BMPs that are neither contained in the Ecology Manual nor have a TAPE GULD rating?**

Snohomish County

Flood control projects

**Let the applicant make the case...**

City of Longview

**Oppose. These projects can have both water quality and ecological benefits. Provisions of the statute provide eligibility standards by requiring a reduction of negative impacts from existing development.**

Pierce

Land Acquisition

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Land Acquisition	<p><b>consider future protecting natural drainage ways</b></p> <p>City of Spokane <b>Land acquisition should be ineligible. Project should still be eligible if applicant purchases land or easement as project match, or additional funding support. If the relocated facility is eligible, than land acquisition should be a local contribution.</b></p> <p>Thurston County <b>Let the applicant make the case...</b></p> <p>City of Longview <b>Riparian acquisition is an accepted capital project under permittees' Structural SW Control programs. Why would this not be eligible for the same grants as other stormwater capital projects?</b></p> <p>Clark County <b>Should be ineligible, since statute is to reduce stormwater impacts from existing development.</b></p> <p>Pierce</p>
Low Impact Development (LID)	<p><b>LID, for purposes of grant funding should be for those projects/BMPs that reduce volume of runoff. This might be through infiltration, evapotranspiration, capture and reuse, or other methods. Just because a bioretention facility doesn't provide for infiltration, it still provides significant volume reduction by evapotranspiration of small storm events and thus reducing pollutant loading to streams. End of pipe infiltration should be considered LID, as it is in the NPDES permit. The end result is the same, reduced volume of direct discharge to receiving waters.</b></p> <p>Thurston County <b>Need to revisit the concept that green infrastructural in a retrofit situation is better. Traditional BMPs are often provide the highest performance and are more feasible in highly developed areas. Green infrastructure is often more unpredictable and costly than traditional BMPs in retrofit situations.</b></p> <p>Clark County <b>Why limit eligible LID approaches?</b></p> <p>City of Longview</p>
Non-stormwater related portions of projects	<p><b>In general agree non-stormwater portions of project should be ineligible; however, how are these defined? If repaving a section of roadway is necessary to ensure delivery of water to the facility is that considered part of the project? Is educational signage, walkways, paths, boardwalks to allow public access considered non-stormwater? What would be the circumstances to allow the non-stormwater elements of project to be eligible?</b></p> <p>Thurston County <b>remain ineligible</b></p> <p>Clark County</p>
Program Integration	<p><b>Grant notice language needs to be VERY CLEAR, about the potential for multiple source consideration</b></p> <p>Thurston County</p>
Stormwater Activity	<p><b>One thing that stood out was the eligibility requirement "Projects without water quality benefit (ex: fish passage), which states that in 2015 "TBD – Expanded program may include projects that do not have a direct benefit to water quality". My concern is that when we start talking fish passage that opens up the game to A LOT more entities. Fish passage is already funded heavily through the Salmon Recovery Funding Board (SRF Board) and other such organizations. Additionally, Ecology is in the middle of a new competitive grant for flood hazard mitigation and projects that improve water quality and fish habitat/passage score higher than those that do not. Again, another new funding source for the fish group to pull from. We are limited in stormwater funding (and flood hazard reduction) and do not need to tie fish passage and stormwater together.</b></p> <p>Chelan County <b>Pollution source control is highly effective for water quality improvement.</b></p> <p>Clark County <b>remove duplicate "stormwater".</b></p>

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Stormwater Activity Stream restoration projects	Pierce  <b>Consider adding wetland and riparian restoration projects to eligibility list. Recent modeling as part of grant effort in Thurston County indicates these restoration projects can have significant water quality improvement impacts. Perhaps if restoration is also tied to a stormwater quality project, i.e.. constructed wetland for treatment with wetland and/or riparian restoration.</b> Thurston County <b>Oppose for same reasons cited above. These projects can have both water quality and ecological benefits.</b> Pierce <b>Suggest high priority</b> Clark County
War Chest multiple years of applications for the same project	<b>need a way to fund large projects</b> City of Spokane <b>Surely we can improve upon and resubmit an application that did not make the cut the year before, or submit for an expansion of successful project that did...</b> City of Longview
<b>Program Specific Definitions</b> Construction of BMPs for new or re-development	<b>I think should include redevelopment that improves an existing system; at least pay for part that solves existing stormwater wq problems</b>  City of Spokane <b>Yes, since re-development projects in particular will deal with existing untreated stormwater</b> Clark County
Projects without water quality benefit (ex: fish passage)	<b>Funding is advocated for improved WQ, seems that some link to WQ is essential. Fish passage with at least some link to water quality or major link to aquatic habitat enhancement should be considered for eligibility.</b> Thurston County <b>Oppose as written. The statute cites eligible projects that "reduce stormwater impacts" and "water quality or "ecological benefit" and "address pollution from existing development" in numerous places. Could support a modification that "expands program to have a direct ecological benefit."</b>
Project-Specific Planning and Design Funding	Pierce  <b>Design only a nice option for small jurisdiction.</b> City of Longview
Recipient Eligibility	<b>Priority should be to permittees. Allow other cities and counties to be eligible for projects that improve WQ on TMDL water bodies.</b> Thurston County <b>should remain limited to cities and counties - the 2013 proviso states these entities are the priority.</b> Clark County <b>Oppose. The statute provides that these funds are "solely for grants to cities and counties" (ESSB 5035.SL, Sec. 3081.(1) \$81,081,000 of the appropriation in this section is provided solely for grants to cities and counties..." Expanding it to "local governments" expands eligibility to special purpose districts, such as sewer and water districts.</b> Pierce
<b>All Programs</b>	
<b>Eligibility</b> Activity Projects	<b>Please elaborate or provide footnote on what constitutes and activity project.</b> Pierce

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Activity Projects	<b>What is an activity project? Sounds like outreach/education, which is already eligible. Need better definition.</b> Clark County
Existing Development	<b>Does this include retrofits?</b> Pierce
<b>General</b> General	<b>Add in Retrofits&gt;</b> Pierce <b>Clark County shares the opinion of other permittees that project eligibility should not hinge on whether or not a project is used to meet permit requirements. This effects both education/outreach projects as well as stormwater capital projects. Neither have defined performance measures under the permit, making it difficult to determine whether a given project would be eligible. The intent of the grant funding is clearly stated in the first paragraph of the 2013 legislative proviso, and does not indicate a restriction for permit-related projects.</b>  Clark County <b>General Comment: Grant funding should balance planning for new projects (Retrofit identification studies), pre-design, design and construction. In past larger municipalities have better applications because they can afford to expend the effort the identify and pre-design projects. Smaller projects didn't have the capacity for this.</b> Thurston County <b>I generally agreed with the priorities for discussion that you presented in the spreadsheet.</b> Washington Public Ports Assoc. <b>Low interest loans that are issued under the Centennial Grant are not preferable for capital stormwater projects.</b> King County <b>Overall the draft documents appear to limit permittee eligibility, do little to promote flexibility, and fail to address the need for funding for planning. Both documents appear to miss opportunities to address stakeholder concerns. In particular, stakeholders share a need for:</b> <ul style="list-style-type: none"><li>• Expanded eligibility of broad range of stormwater management projects and project components. Cities and counties should be able to prioritize activities and leverage state with local funds to address the most critical needs</li><li>• Opportunities for flexible implementation such as with capacity grants</li><li>• Additional resources for capital planning are a critical need and a significant shortcoming for lining up feasible and effective capital projects</li></ul>
<b>Program Specific Definitions</b> Construction of BMPs for new or re-development	Clark County <b>Overall, I think that somehow we need to build in this notion that long-term we want to fund and encourage local governments to cooperatively work together to ID and prioritize SW retrofits at some watershed/landscape scale, using methods and process that are agreeable to the state. One idea is to build this in under Project Specific Planning and Design Funding. Another idea is to not build it into the table now, but to say I've brought it forth to you now, and we've chosen to simply bring it up to the group at the next meeting.</b> Puget Sound Partnership
Green Infrastructure	<b>Oppose. Statute is for reducing existing pollution problems.</b> Pierce
Local Governments	<b>Distinguish from LID if it's different. Clarify if retrofit relative to LID retrofit which is an oxymoron.</b> Clark County
Projects without water quality benefit (ex: fish passage)	<b>Too vague to provide comments</b> Thurston County

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Projects without water quality benefit (ex: fish passage)	<b>Support. Statute provides for projects with "ecological benefit."</b> Pierce
<b>Priority for Work Group Discussion</b>	
<b>Application Rating and Ranking Process</b>	
Enhanced Maintenance	<b>This is a high priority for state funding.</b> Clark County
<b>Eligibility</b>	
Stream restoration projects	<b>Stream restoration projects can have significant water quality benefits and reduce stormwater impacts from existing development, which is the objective of the Legislative proviso. Should be eligible in 2014 and long-term.</b> Clark County
<b>Program Specific Definitions</b>	
Local Governments	<b>Low priority.</b> Clark County
Runoff from commercial/industrial/ private property	<b>Priority should be "medium priority" if the BMP provides improved WQ which discharges to a surface water</b> Thurston County